ESandH manual

Environment, Safety, and Health

Volume I

Part 4: Feedback and Improvement

4.2
Environmental, Safety, and Health
Deficiency Tracking System

(Formerly H&SM S2.03)

Recommended for approval by the ES&H Working Group

Approved by: Robert W. Kuckuck
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Minor revision, no new requirements

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Revision 0

4.2

Environment, Safety, and Health Deficiency Tracking System[*]

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[*] **Minor revision**

4.2

Environmental, Safety, and Health Deficiency Tracking System

1.0 Policy Statement

The Lawrence Livermore National Laboratory (LLNL) maintains a Deficiency Tracking System (DefTrack) which is to be used by all directorates to record and track the status of environmental, safety, and health (ES&H) deficiencies. Certain categories of deficiencies require mandatory inclusion into the DefTrack database. Each directorate has full discretion to determine which additional categories of deficiencies to include in its local DefTrack database.

The DefTrack database is also to be used to document formal self-assessment activities in which no deficiencies are discovered.

Detailed information about the DefTrack system are in the *DefTrack User Manual* and the *DefTrack System Maintenance Manual* which are maintained by the Assurance Review Office.

2.0 Requirements for Deficiency Tracking System

2.1   Mandatory Items

All directorates shall record and track in DefTrack the status of the following categories of ES&H deficiencies:

- All Priority 1A and 1B deficiencies in their "as found" condition.

- Deficiencies identified during formal self-assessments.

- Priority 1, 2, and 3 deficiencies identified in formal appraisal reports prepared by the Department of Energy (DOE), the University of California (UC), the Director's Office, the Assurance Review Office (ARO), or external agencies (i.e., other federal agencies and state and local government agencies).

Each of these items is to be entered into the directorate's local DefTrack database within 60 days of notification (i.e., discovery in the case of Priority 1A/1B and self-assessment items or receipt of a formal report in all other cases). These items shall be rolled up to the institutional DefTrack database in accordance with the criteria specified in the sections that follow. *The institutional DefTrack database constitutes the official LLNL ES&H deficiency tracking database.*

2.2 Discretionary Items

2.2.1 Discretionary Criteria

Each directorate retains full discretion to determine which additional categories of ES&H deficiencies to enter into its local DefTrack database. Directorate discretion extends to Priority 2, 3, and 4 deficiencies identified during informal self-assessment activities and daily support by ES&H Team members.

2.2.2 Documenting Discretionary Criteria

Each directorate is responsible for documenting its criteria for inclusion and/or exclusion in its local DefTrack database of these discretionary items (i.e., Priority 2, 3, and 4 deficiencies identified during informal self-assessments and daily support by ES&H Team members).

2.3 The Directorate DefTrack System

Each directorate shall designate a DefTrack Administrator to ensure that ES&H deficiencies are properly entered into the local DefTrack database. DefTrack Administrators shall be trained to use the DefTrack system. The *DefTrack Users Manual* defines the DefTrack software operating procedures.

To facilitate analysis and trending, a compliance code must be associated with each ES&H deficiency entered into DefTrack. The Assurance Review Office (ARO) maintains the DefTrack compliance code list. The ES&H Working Group will periodically review and update the compliance code list.

Each compliance code is associated with a suggested priority level. A technical justification is required if an item with a suggested priority of 1A or 1B is entered into DefTrack at a lower priority level. The technical justification shall be documented in the DefTrack description field.

2.4 Rollup to Institutional DefTrack System

All Priority 1A and 1B deficiencies[†] and Priority 2 and 3 deficiencies identified in formal written appraisal reports prepared by the DOE, UC, the Director's Office, the Assurance Review Office (ARO), or external agencies shall be entered into the responsible directorate's local DefTrack database. Each of the prescribed deficiencies shall be

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[†] Specific requirements exist for handling DefTrack Priority 1A and 1B deficiencies. Priority 1A items cannot be abandoned once discovered and must be mitigated to some lower priority level or completely corrected before leaving the scene unattended. Priority 1B items must be mitigated to a lower priority level or completely corrected within 5 working days of discovery. If the item cannot be corrected or mitigated within 5 working days, a mitigation plan must be generated and approved by DOE/OAK within the 5-day window.

entered into the local DefTrack database within 60 days of discovery or notification and then rolled up to the institutional DefTrack database.

Deficiencies identified during formal self-assessments are to be entered into the responsible directorate's DefTrack database. For deficiencies resulting from formal self-assessments and for all discretionary items entered into DefTrack, the criteria for rollup to the institutional database are as follows:

- Priority 1A/1B: Rollup is required.
- Priority 2: Rollup is required.
- Priority 3: Rollup is required when either the action will cost over $10,000 or the estimated completion will take more than 180 days. Rollup is not required for other Priority 3 items.
- Priority 4: No rollup is required.

DefTrack is also to be used to document formal self-assessment activities for which no deficiencies are discovered. This information is to be rolled up to the institutional database.

Rollup to the institutional DefTrack database will automatically occur when data meeting the specified criteria are entered into the DefTrack database and the roll-up procedure is initiated. Difficulties arising during rollup should be referred to the ARO's DefTrack System Manager.

2.5   Transfer of DefTrack Items

The ES&H deficiencies entered into the DefTrack database may not be transferred unilaterally from one directorate to another. Agreement must be obtained from the proposed "receiving" organization before transfer of any DefTrack item can take place. The *DefTrack Users Manual* describes the procedures for transferring items between directorates.

2.6   Completion of DefTrack Items

At a minimum, each directorate shall assure the completion of corrective actions for Priority 1A and 1B and Priority 2 deficiencies. Each directorate shall document its process for verifying completion of items entered in its local DefTrack database.

3.0 Responsibilities

All workers and organizations shall refer to Document 2.1, "Laboratory and ES&H Policies, General Worker Responsibilities, and Integrated Safety Management" in the *ES&H Manual* for a list of general responsibilities. This section describes specific responsibilities of LLNL organizations and workers who have key safety roles.

3.1   Directorate

Each directorate independently maintains a local copy of the DefTrack database and is responsible for the completeness and accuracy of the information contained within it and the roll-up files sent to ARO. (NOTE: Many data-field requirements are enforced through controls built into the DefTrack software. The *DefTrack Users Manual* provides detailed directions concerning DefTrack data entry and roll-up procedures.)

Each directorate is also responsible for maintaining and controlling the individual accounts on its local DefTrack database. The DefTrack Administrator and/or DefTrack Server Administrator shall insure that all employees requiring access to the information within its local DefTrack database will have appropriate logon access and account privileges necessary to perform their required duties.

3.2   Assurance Review Office

The ARO is responsible for maintaining the DefTrack software, the DefTrack compliance code list, and the institutional DefTrack database. The ARO also maintains the *DefTrack Users Manual* and the *DefTrack System Maintenance Manual*. The latter describes the procedures governing maintenance of the DefTrack software and the institutional DefTrack database.

Difficulties arising during rollup should be referred to the ARO's DefTrack System Manager. Conversely, if the ARO identifies a problem with a particular directorate's rollup, the DefTrack System Manager will notify the cognizant DefTrack Administrator.

3.3   ES&H Working Group

The ES&H Working Group will periodically review this document—to ensure it remains consistent with related requirements—and the DefTrack compliance code list.

4.0 LLNL Contacts

Contact the following as necessary for additional information about this document:

- Assurance Review Office.

- Directorate DefTrack System Administrator.

- Directorate Assurance Manager.